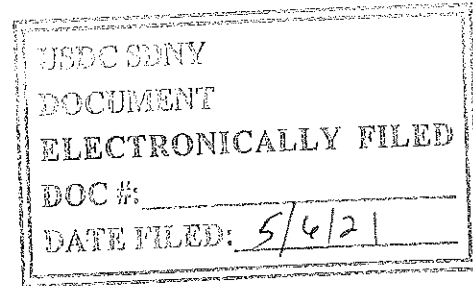




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18 cr 759 (RMB)

May 5, 2021

**VIA E-MAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Dear Judge Berman:

We write as counsel to James Moore in the above-captioned matter, to follow up on yesterday's submission from USPO Ashley Geiser and to request, on consent of the government, an adjournment of the sentencing schedule of approximately 30 days to allow Mr. Moore to review the initial iteration of PSR and to enable me as counsel to prepare our submission to the Court.

Ms. Geiser's memorandum accurately summarizes the reasons for our request: Mr. Moore did not receive a copy of the initial publication of the PSR, and my own leave for medical purposes has extended longer than I previously estimated for the Court. However, as Ms. Geiser notes, my partner Robert Heim has communicated with Mr. Moore by e-mail to discuss the circumstances and he has authorized us to seek a 30-day adjournment of the schedule (which now has the matter on for a May 25 sentencing hearing, with defense submission May 11 and government May 18). We therefore request, on consent of the government (by AUSA Vainberg), a sentencing on a date convenient to the Court approximately 30 days out from May 25, with the submission dates adjusted accordingly.

The Honorable Richard M. Berman

May 5, 2021

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We appreciate the Court's attention to this request. The parties are available to discuss any questions or issues.

Respectfully submitted,

/s/ Michael J. Grudberg

Michael J. Grudberg

cc:

Vladislav Vainberg AUSA

Martin Bell AUSA

Ashley Geiser USPO

(all via e-mail)

<u>Sentence is adjourned to</u> <u>6/29/21 at 11:00am.</u>	
<u>Defense submission is due</u> <u>6/9/21. Government</u> <u>submission is due 6/16/21.</u>	
<hr/>	
SO ORDERED:	<u>Richard M. Berman</u>
Date: <u>5/6/21</u>	Richard M. Berman, U.S.D.J.